

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DAVID SHEPHERD

Plaintiff,

v.

DENNIS WAYNE TOLLETT

Defendant.

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CIVIL ACTION NO. 4:24-cv-4541

**DEFENDANT DENNIS WAYNE TOLLETT'S
RULE 26(a)(1) INITIAL DISCLOSURES**

To: Plaintiff, David Shepherd by and through his attorneys of record, Richard "Trey" Barton, III and Faizan Ghaznavi, Law Office of Richard L. Barton, III, PLLC, 4151 Southwest Freeway, Suite 675, Houston, Texas 77027.

COMES NOW **DENNIS WAYNE TOLLETT** ("Defendant"), in the above-styled and numbered cause, and submits this, his Initial Disclosures.

Respectfully submitted,

LANZA LAW FIRM, P.C.



NICK LANZA

TBA No. 11941225

W. TRAVIS HOOKHAM

TBA No. 24115491

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ATTORNEYS FOR DEFENDANT,

DENNIS WAYNE TOLLETT

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was sent to all known counsel of record on the 25th day of February, 2025, as indicated:

Faizan Ghaznavi

Via Email: faizan@treybartonlaw.com

Richard "Trey" Barton, III

LAW OFFICE OF RICHARD L. BARTON, III, PLLC

4151 Southwest Freeway, Suite 675

Houston, TX 77027

A handwritten signature in black ink, appearing to read "W. Travis Hookham", written over a horizontal line.

W. TRAVIS HOOKHAM

DEFENDANT'S INITIAL DISCLOSURES

- (A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information;

RESPONSE:

DAVID SHEPHERD

c/o FAIZAN GHAZNAVI
AND RICHARD "TREY" BARTON, III
LAW OFFICE OF RICHARD L. BARTON, III, PLLC
4151 Southwest Freeway, Suite 675
Houston, Texas 77027
T: (832) 916-2526
Plaintiff

DENNIS WAYNE TOLLETT

c/o W. TRAVIS HOOKHAM
AND NICK LANZA
LANZA LAW FIRM
2502 Algerian Way
Houston, Texas 77098
T: (713) 432-9090
Defendant

COLLEEN TOLLETT

c/o W. TRAVIS HOOKHAM
AND NICK LANZA
LANZA LAW FIRM
2502 Algerian Way
Houston, Texas 77098
T: (713) 432-9090
Defendant's spouse and passenger in the vehicle involved in the subject accident.

JESUS EDUARDO HURTADO

114 E 32nd Street
Houston, Texas 77018
Driver of a vehicle also involved in the subject accident.

OFFICER M. GREEN, ID NO. 9994

Houston Police Department
1200 Travis Street
Houston, Texas 77002

T: (713) 884-3131

Investigating officer at the scene.

Any treating physicians, health care providers, medical care facilities, clinics, hospitals and custodian(s) of medical/billing/radiological records, involved in the care, medical evaluation and treatment of Plaintiff, with knowledge of his medical condition prior to and/or following the incident in question, including:

THE HEIGHTS HOSPITAL

1917 Ashland Street

Houston, Texas 77008

T: (346) 396-1314

Plaintiff's medical provider.

CHIROMAX WELLNESS CENTER, INC.

5324 North Freeway, Suite 120

Houston, Texas 77022-1851

T: (713) 691-8355

Plaintiff's medical provider.

TEXAS REGIONAL CLINIC

8301 Katy Freeway, Suite 101

Houston, Texas 77024

T: (713) 489-1741

Plaintiff's medical provider.

TRC ORTHO CLINIC 1900

1900 N. Loop West, Suite 670

Houston, Texas 77018

T: (713) 489-1741

Plaintiff's medical provider.

MEMORIAL MRI & DIAGNOSTICS

1900 N. Loop West #160

Houston, Texas 77018-8100

T: (713) 461-3399

Plaintiff's medical provider.

- (B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

RESPONSE:

Progressive Policy No. 70856977	TOLLETT 000001-000003
Texas Peace Officer's Crash Report	TOLLETT 000004-000012
Photos	TOLLETT 000013-000130
Transcribed Report of Loss	TOLLETT 000131-000134
Recorded Statement of Dennis Tollett	TOLLETT 000135

Please use the following link to access the production: [Shepherd v. Tollett - Production](#)

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

RESPONSE:

The Defendant is not seeking any economic damages.

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

See the Declarations Page produced herein and bates-labeled TOLLETT 000001-000003.